



Linda S. Adams
Secretary for
Environmental Protection



Department of Toxic Substances Control

Maureen F. Gorsen, Director
5796 Corporate Avenue
Cypress, California 90630



Arnold Schwarzenegger
Governor

Sent Via Email

November 6, 2007

Ms. Yvonne Meeks
Portfolio Manager – Site Remediation
Pacific Gas and Electric Company
4325 South Higuera Street
San Luis Obispo, CA 93401

EXPANDED METAL ANALYSIS AT EXISTING GROUNDWATER MONITORING
WELLS AT PACIFIC GAS AND ELECTRIC COMPANY (PG&E), TOPOCK
COMPRESSOR STATION, NEEDLES, CALIFORNIA (EPA ID NO. CAT080011729)

Dear Ms. Meeks,

As a follow up to our meeting on July 10, 2007 and our letter of September 28, 2007 regarding the modifications to the general groundwater and surface water monitoring program (GMP), the Department of Toxic Substances Control (DTSC) has reviewed the site wide metals analysis data in groundwater. Pursuant to Item 3 of the September 28, 2007 letter, DTSC is requesting PG&E to add the analysis of the full California metal suite to several of the existing groundwater monitoring wells for a minimum of four quarters. The additional metals evaluation may help in the understanding of the anomalous concentration of some metals found in Monitoring Well 12.

Attached is a memorandum from Mr. Christopher Guerre of our Geologic Services Unit detailing the rationale for sampling certain wells. DTSC requests that the results of the metals analysis be incorporated, as time allows, in the up coming Volume II RCRA Facility Investigation Report, its addendum and in the GMP reports.

Ms. Yvonne Meeks
November 6, 2007
Page 2 of 2

If you have any questions regarding this letter, please contact me at (714) 484-5439.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Aaron Yue', with a stylized flourish at the end.

Aaron Yue
Project Manager
Geology, Permitting and Corrective Action Branch

enclosure

aky:110701A

cc: PG&E Topock Consultative Workgroup Members – Via e-mail
PG&E Topock Geo/Hydro Technical Workgroup Members – Via e-mail
Tribal Representatives in PG&E Contact List – Via e-mail



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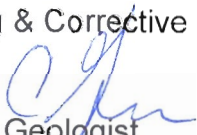


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TO: Aaron Yue
Project Manager
Geology, Permitting & Corrective Action Branch

FROM: Chris Guerre, CHG 
Senior Engineering Geologist
Geological Services Unit

DATE: November 5, 2007

SUBJECT: Title 22 Metals Analyses at Select Groundwater Wells
PG&E Topock Compressor Station, Needles, California
Project No. 22120/540015-48/36

INTRODUCTION

The Geological Services Unit (GSU) of the Department of Toxic Substances Control (DTSC) is recommending that certain groundwater monitoring wells be analyzed for the CA Title 22 Metals suite¹ based on review of the existing groundwater data base. PG&E was notified of this metals sampling requirement during a July 10, 2007 meeting regarding optimization of the site wide Groundwater and Surface Water Monitoring Program (GMP) that included modification of Title 22 metals analyses. The Title 22 metals analysis requirement was mentioned again in DTSC's September 28, 2007 letter to PG&E conditionally approving PG&E's proposed GMP modifications. During a meeting on October 3, 2007, PG&E requested that DTSC provide direction on the analyses by the first week of December 2007.

COMMENTS

Additional Title 22 metals analyses are being requested to better characterize the occurrence and distribution of metals in groundwater. In general, additional metals data are requested to ensure adequate coverage of the site based on localized detections of metals from previous sampling events and/or the paucity of metals data in certain areas. The data request builds upon recently collected data and focuses on three main areas:

¹Title 22 Metals: Antimony, Arsenic, Barium, Beryllium, Cadmium, Chromium, Cobalt, Copper, Lead, Mercury, Molybdenum, Nickel, Selenium, Silver, Thallium, Vanadium, Zinc.

the compressor station, the MW-12/MW-23 area, and the flood plain. The majority of the wells are step out wells radiating from well MW-12. Well TW-01 is selected to assess potential impacts from compressor station operations. Although not ideally located, well TW-01 is the only available alluvial well located near the station. Two wells have been selected in the floodplain area that are either located in a chromium hot spot (well MW-50-200) or along the leading edge of the plume (MW-44-115).

The monitoring wells listed below should be sampled for CA Title 22 metals on a quarterly schedule to assess potential seasonal/temporal variations for a minimum of one year.

Well	Rationale	Notes
MW-12	CONTINUE TITLE 22 ANALYSES	ELEVATED ARSENIC, MOLYBDENUM
MW-21	ADJACENT TO MW-12 AND 23	2005 DATA: SELENIUM 29.8 UG/L
MW-22	STEP OUT FROM MW-12 AND 23	NO FULL METALS SUITE
MW-23	CONDUCT TITLE 22 ANALYSES DURING ASSESSMENT, STEP OUT FROM MW-12	ANOMALOUS CHROMIUM IN BEDROCK IN 2006 & 2007
MW-24A	STEP OUT WEST OF MW -12	NO FULL METALS SUITE
MW-26	STEP OUT FROM MW-12	NO FULL METALS SUITE
MW-32-035	STEP OUT FROM MW-12	NO FULL METALS SUITE
MW-43-025	STEP OUT FROM MW-12	NO METALS DATA OTHER THAN CHROMIUM
MW-44-115	LEADING EDGE OF PLUME IN FLOODPLAIN	NO METALS DATA OTHER THAN CHROMIUM
MW-48	STEP OUT FROM MW-12 AND 23	NO METALS DATA OTHER THAN CHROMIUM
MW-50-200	CHROMIUM HOT SPOT NEAR FLOODPLAIN	NO METALS DATA OTHER THAN CHROMIUM
MW-51	STEP OUT FROM MW-12	NO METALS DATA OTHER THAN CHROMIUM
TW-01	EVALUATE POTENTIAL COMPRESSOR STATION SOURCES	2004 DATA: SELENIUM 155 UG/L, SILVER 87 UG/L

The CA Title 22 metals data should be reported in the GMP Reports. At least one round of data should be reported in the RFI Volume 2 Report Addendum currently planned and possibly in the RFI Volume 2 Report if time permits.

Questions regarding this memorandum should be directed to Chris Guerre at (714) 484-5422 or by email at cguerre@dtsc.ca.gov.

Peer Reviewed By: Alfredo Zanolria, CHG, CEG